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7
8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 2008 - 300

12 **HISAO YOSHIDA**
140 South Van Ness Avenue, Suite 209
San Francisco, CA 94103-2583

A C C U S A T I O N

13 Registered Nurse License No. 522803

14 Respondent.
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17 Complainant alleges:

18 **PARTIES**

19 1. Ruth Ann Terry, M.P.H, R.N (Complainant) brings this Accusation solely
20 in her official capacity as the Executive Officer of the Board of Registered Nursing.

21 2. On or about June 24, 1996, the Board of Registered Nursing issued
22 Registered Nurse License Number 522803 to Hisao Yoshida (Respondent). The Registered
23 Nurse License was in full force and effect at all times relevant to the charges brought herein and
24 will expire on September 30, 2009, unless renewed.

25 **JURISDICTION**

26 3. This Accusation is brought before the Board of Registered Nursing
27 (Board), under the authority of the following laws. All section references are to the Business and
28 Professions Code unless otherwise indicated.

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1 punch her (Kim) in the face.”

2 10. During the performance evaluation, Respondent also referred to other co-
3 workers as “faggots,” “motherfuckers,” and “fat cunts.” LaRocca asked Respondent to stop
4 using profanity, but he continued nevertheless.

5 11. With respect to another co-worker, Charletta Stewart, R.N. (Stewart),
6 Respondent stated to LaRocca that he wanted “to run her off the road,” that he had “waited for
7 her and stopped driving (his) small car and started driving (his) truck because (he) could run her
8 off the road.” Respondent further stated that he had “thought about setting her on fire,” had
9 “waited for her, but she had slipped by him,” and that he felt “like stabbing her with scizzors.”

10 12. On or about August 10, 2005, Stewart obtained a Temporary Restraining
11 Order against Respondent. On or about August 17, 2005, Respondent resigned from Kaiser.

12 **FIRST CAUSE FOR DISCIPLINE**

13 **(Unprofessional Conduct)**

14 13. Respondent is subject to disciplinary action under section 2761(a) of the
15 Code on the grounds of unprofessional conduct in that, on or about July 26, 2005, he used
16 profanity and exhibited hostile and unstable behavior during his performance evaluation, as set
17 forth in paragraphs 9 through 11, above.

18 **SECOND CAUSE FOR DISCIPLINE**

19 **(Unprofessional Conduct)**

20 14. Respondent is subject to disciplinary action under section 2761(a) of the
21 Code on the grounds of unprofessional conduct in that, on or about July 26, 2005, during his
22 performance evaluation, he threatened to harm Stewart, a co-worker, as set forth in paragraph 11,
23 above. On or about August 10, 2005, Stewart obtained a Temporary Restraining Order against
24 Respondent

25 **THIRD CAUSE FOR DISCIPLINE**

26 **(Unprofessional Conduct)**

27 15. Respondent is subject to disciplinary action under section 2761(a) of the
28 Code and on the grounds of unprofessional conduct in that, on or about December 4, 2004, while

1 on duty at Kaiser, he used profanity and exhibited hostile and unstable behavior, which was
2 directed at patients at Kaiser, as set forth in paragraph 8, above.

3 **PRAYER**

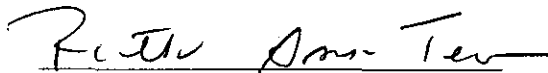
4 WHEREFORE, Complainant requests that a hearing be held on the matters herein
5 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

6 1. Revoking or suspending Registered Nurse License Number 522803, issued
7 to Hisao Yoshida

8 2. Ordering Hisao Yoshida to pay the Board of Registered Nursing the
9 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
10 Professions Code section 125.3;

11 3. Taking such other and further action as deemed necessary and proper.

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13 DATED: 4/23/08

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16 RUTH ANN TERRY, M.P.H., R.N.
17 Executive Officer
18 Board of Registered Nursing
19 State of California
20 Complainant
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